ANNUAL ECONOMIC SUBSTANCE RETURN

For Assessment Period 20

(Form Approved by the Comptroller under section 29 International Tax Co-operation (Economic Substance) Act 2020

It is a serious offence to make a false return

FORM 2

Note:

- 1. This form must be completed by every relevant entity¹ that undertook a relevant activity during the assessment period and in this form "relevant entity" refers to a relevant entity that is required to complete this form.
- 2. Supporting documentation must be submitted with this return. Where additional explanations are required, or would assist the Comptroller to make an assessment, these should be provided on a separate sheet.

Row 1: Relevant Activities Undertaken				
To be	completed by all relevant entities			
1.	Relevant Activities and gross income			
	Which relevant activities did the relevant ent out the gross income (in EC\$ or EC\$ equivalent)	•	•	(tick all applicable), setting
	Relevant Activity		Gross Income Generated	
	Banking business			Complete rows 7 to 11
	Distribution and service centre business			Complete rows 12 to 16
	Finance and leasing business			Complete rows 17 to 21
	Fund management business			Complete rows 22 to 26
	Headquarters business			Complete rows 27 to 31
	Holding entity business			Complete rows 32 to 38
	Insurance business			Complete rows 39 to 43
	Intellectual property holding business			Complete rows 44 to 49
	Shipping business			Complete rows 50 to 54
	Total gross income generated from relevant a Note:	ctivities		
	The row(s) specific to a relevant activity are of the activity is greater than \$0	nly requi	red to be completed if the gros	ss income generated by
Rows	2 to 6: Holding Entities and Ultimate Benefici	al Owner	rs	
To be	completed by all relevant entities			
2.	Holding Entities			
	List all holding entities of the resident entity:			
	Holding entity 1:			
	Full legal name of holding entity:			

¹ A relevant entity is a resident entity that is not an excluded entity.

Former names (if any):
Address of holding entity's principal place of business or principal office:
Address of holding entity's registered office (if applicable):
Logal form of holding ontitue
Legal form of holding entity: Country in which holding entity is constituted:
Law by which holding entity is governed:
The registration number or similar of the holding entity (if applicable):
Is the holding entity an ultimate holding entity: Yes
No
Holding entity 2 (if applicable):
Full legal name of holding entity:
Former names (if any):
Address of holding entity's principal place of business or principal office:
Address of holding entity's registered office (if applicable):
Legal form of holding entity:
Country in which holding entity is constituted:
Law by which holding entity is governed:
The registration number or similar of the holding entity (if applicable):
Is the holding entity an ultimate holding entity: Yes
No
If more than 2 holding entities, continue on separate sheet providing the information set out in this row for each additional holding entity
Go to row 3
Ultimate Beneficial Owners
Does the entity have any ultimate beneficial owners who are individuals:
Yes Go to row 4
No Go to row 5
State the number of ultimate beneficial owners of the entity who are individuals:
Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual:
Ultimate beneficial owner (individual) 1:
Full legal name:
Former names (if any):

	Nationality:	
	Country in which located:	
	Usual residential address:	
	Basis for beneficial ownership:	Issued shares
		Voting rights
		Right to appoint/remove director
		Significant influence or control
		the significant influence or control are held or exercised indirectly or
	through another person, provide full de	etails:
	Ultimate beneficial owner (individual) 2:	
	Full legal name:	
	Former names (if any):	
	Nationality:	
	Country in which located:	
	Usual residential address:	
	Basis for beneficial ownership:	Issued shares
		Voting rights
		Right to appoint/remove director
		Significant influence or control
	If the shares voting or other rights or t	the significant influence or control are held or exercised indirectly or
	through another person, provide full de	
	If the entity has more than 2 ultimate ben	reficial owners who are individuals, continue on separate sheet
	providing the same information for each a	additional ultimate beneficial owner who is an individual beneficial
	owner	
	Go to row 5	
5.	Does the entity have any (non-individual)	ultimate beneficial owners:
		Yes Go to row 6
		No Complete rows 7 to 54, as appropriate
6.	How many ultimate beneficial owners of t	the entity are persons who are not individuals:
	=	spect to each ultimate beneficial owner of the entity who is a person
	other than an individual:	
	Ultimate (non-individual) beneficial own	er 1:
	Type of person and legal form:	
	Full legal name:	
	Country in which located:	

Registered office (if applicable):		
registered office (if applicable).		
The registration number or similar of	f the entity (if applicable):	
Basis for beneficial ownership:	Issued shares	
	Voting rights	
	Right to appoint/remove director	
	Significant influence or control	
If the shares, voting or other rights o	r the significant influence or control are held o	or exercised indirectl
through another person, provide full	_	
Ultimate (non-individual) beneficial ow	vner 2:	
Type of person and legal form:		
Full legal name:		
Country in which located:		
Address:		
Registered office (if applicable):		
The registration number or similar of	f the entity (if applicable):	
Basis for beneficial ownership:	Issued shares	
·	Voting rights	
	Right to appoint/remove director	
	Significant influence or control	
If the shares, voting or other rights o through another person, provide full	r the significant influence or control are held o	or exercised indirectl

Rows	ows 7 to 11: Banking Business		
7.	CIGA		
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):		
	(i) Raising funds		
	(ii) Managing risk, including credit, currency and interest risk		
	(iii) Taking hedging positions		
	(iv) Providing loans, credit or other financial services to customers		
	(v) Managing regulatory capital		
	(vi) Preparing regulatory reports or returns		
8.	Employees Physically Present in Saint Vincent and the Grenadines		
	8.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the banking business of the entity:		
	8.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:		
	8.3 Details of experience of FTE stated above:		
9.	Premises Address of each premises in Saint Vincent and the Grenadines used in the banking business:		
	If more than one premises, specify details on a separate sheet		
10.	Operating Expenditure		
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the banking business:		
11.	Outsourcing		
	Have any of the CIGA been outsourced: Yes No Provide the additional information below		
	11.1 To how many outsourcing providers have the CIGA been outsourced:		
	11.2 Provide the following information in respect of each outsourcing provider:		
	Name:		
	Address:		
	11.3 Expenditure on the outsourcing provider:		
	11.4 Have the outsourcing provider's employees been included within the FTE for the activity: Yes		
	No L		
	11.5 Have the outsourcing provider's premises been included in row 9:		
	Yes No		
	Provide the information specified in 11.1 to 11.5 with respect to each additional outsourcing provider on a separate sheet		
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55		

Rows	12 to 16: Distribution and Services Centre Business
12.	CIGA
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):
	(i) Transporting and storing goods, components and materials
	(ii) Managing stocks
	(iii) Taking and processing orders
	(iv) Providing consulting or other administrative services
13.	Employees Physically Present in Saint Vincent and the Grenadines
	13.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the distribution and services centre business of the entity:
	13.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:
	13.3 Details of experience of FTE stated above:
14.	Premises
	Address of each premises in Saint Vincent and the Grenadines used in the distribution and services centre business:
	If more than one premises, specify details on a separate sheet
15.	Operating Expenditure Total gross expenditure incurred in Saint Vincent and the Grenadines on the distribution and services centre business:
16.	Outsourcing
	Have any of the CIGA been outsourced: Yes No Provide the additional information below
	16.1 To how many outsourcing providers have the CIGA been outsourced:
	16.2 Provide the following information in respect of each outsourcing provider:
	Name:
	Address:
	16.3 Expenditure on the outsourcing provider:
	16.4 Have the outsourcing provider's employees been included within the FTE for the activity: Yes
	No L 16.5 Have the outsourcing provider's premises been included in row 14:
	Yes No
	Provide the information specified in 16.1 to 16.5 with respect to each additional outsourcing provider on a separate sheet
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55

Rows	17 to 21: Finance and Leasing Business	
17		
17.	CIGA	
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):	
	(i) Agreeing funding terms	
	(ii) In the case of leasing business, identifying and acquiring assets to be leased	
	(iii) Setting the terms and duration of financing or leasing agreements	
	(iv) Monitoring and revising finance and leasing agreements	
	(v) Managing risks associated with finance and leasing agreements	
18.	Employees Physically Present in Saint Vincent and the Grenadines	
	 18.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the finance and leasing business of the entity: 18.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications: 	
	18.3 Details of experience of FTE stated above:	
19.	Premises	
	Address of each premises in Saint Vincent and the Grenadines used in the finance and leasing business:	
	If more than one premises, specify details on a separate sheet	
20.	Operating Expenditure	
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the finance and leasing business:	
21.	Outsourcing	
	Have any of the CIGA been outsourced: Yes No Provide the additional information below	
	NO L	
	31.1. To how many outcoming any ideas have the CICA hoor outcomed.	
	21.1 To how many outsourcing providers have the CIGA been outsourced:	
	21.2 Provide the following information in respect of each outsourcing provider:	
	Name:	
	Address:	
	21.3 Expenditure on the outsourcing provider:	
	21.4 Have the outsourcing provider's employees been included within the FTE for the activity:	
	Yes	
	No	
	21.5 Have the outsourcing provider's premises been included in row 19:	
	Yes	
	No 🗆	
	Provide the information specified in 21.1 to 21.5 with respect to each additional outsourcing provider on a separate sheet	

Rows	22 to 26: Fund Management Business	
22.	CIGA	
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):	
	(i) Taking decisions on the holding and selling of investments	
	(ii) Calculating risk and reserves	
	(iii) Taking decisions on currency or interest fluctuations and hedging positions	
	(iv) Preparing reports and returns to investors and to the FSA or an equivalent	
	authority or body (see Act for full wording)	
23.	Employees Physically Present in Saint Vincent and the Grenadines	
	23.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the fund management business of the entity:	
	23.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:	
	23.3 Details of experience of FTE stated above:	
24.	Premises	
	Address of each premises in Saint Vincent and the Grenadines used in the fund management business:	
	If more than one premises, specify details on a separate sheet	
25.	Operating Expenditure	
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the fund management business:	
26.	Outsourcing	
	Have any of the CIGA been outsourced: Yes Provide the additional information below	
	No No	
	26.1 To how many outsourcing providers have the CIGA been outsourced:	
	26.2 Provide the following information in respect of each outsourcing provider:	
	Name:	
	Address:	
	26.3 Expenditure on the outsourcing provider:	
	26.4 Have the outsourcing provider's employees been included within the FTE for the activity:	
	Yes	
	No 🗆	
	26.5 Have the outsourcing provider's premises been included in row 24:	
	Yes	
	No	
	Provide the information specified in 26.1 to 26.5 with respect to each additional outsourcing provider on a	
	separate sheet Continue to payt applicable relevant activity or if no other relevant activities undertaken, go to row 55	
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55	

Rows	27 to 31: Headquarters Business
27.	CIGA The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable): (i) Taking relevant management decisions (ii) Incurring expenditures on behalf of group entities (iii) Co-ordinating group activities
28.	Employees Physically Present in Saint Vincent and the Grenadines 28.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the headquarters business of the entity: 28.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications: 28.3 Details of experience of FTE stated above:
29.	Premises Address of each premises in Saint Vincent and the Grenadines used in the headquarters business: If more than one premises, specify details on a separate sheet
30.	Operating Expenditure Total gross expenditure incurred in Saint Vincent and the Grenadines on the headquarters business:
31.	Outsourcing Have any of the CIGA been outsourced: Yes No Provide the additional information below
	31.1 To how many outsourcing providers have the CIGA been outsourced: 31.2 Provide the following information in respect of each outsourcing provider: Name: Address:
	31.3 Expenditure on the outsourcing provider: 31.4 Have the outsourcing provider's employees been included within the FTE for the activity: Yes No
	31.5 Have the outsourcing provider's premises been included in row 29: Yes No
	Provide the information specified in 31.1 to 31.5 with respect to each additional outsourcing provider on a separate sheet Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55

Rows	32 to 38	88: Holding Entity Business	
32.	Is the e	entity a pure equity holding entity:	
		Yes	Go to row 33
		No [Go to row 34
33.	Pure Ed	Equity Holding Entity	
	Compa	e entity undertake the work and activities required to anies Act [Cap. 143] or the International Business Con nt and the Grenadines:	
		Yes	
		No	
	, ,	the answer is yes:	
	(a)	 State the number of persons that are engaged in the shares or equitable interests that the compar 	
	(b)	State the address in Saint Vincent and the Grenac premises used for managing the shares or equital that the company holds:	
	(c)	c) Does the entity consider that the persons and presents or equitable interests that the company has been shared or equitable interests that the company has been sometimed by the company has been shared or equitable interests that the persons and presents or equitable interests that the company has been supported by the persons and presents or equitable interests that the company has been supported by the persons and presents or equitable interests that the company has been supported by the persons and presents of the persons are presented by the persons are pr	
		requirements	
34.	Specify	y Holding Entity (other than a pure equity holding er by the activities specified in section 8(1)(a) to (i) of the earns from the relevant activity concerned:	•
	(i)		
	(ii)		
	(iii)		
	(iv)		
	(v)		
	(vi)		
	Continu	nue on a separate sheet if necessary.	

35.	Employees Physically Present in Saint Vincent and the Grenadines		
	65.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the holding entity business of the entity:		
	65.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:		
	65.3 Details of experience of FTE stated above:		
36.	Premises		
	Address of each premises in Saint Vincent and the Grenadines used in the holding entity business:		
	If more than one premises, specify details on a separate sheet		
37.	Operating Expenditure		
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the holding entity business:		
38.	Outsourcing		
	Have any of the CIGA been outsourced: Yes No Provide the additional information below		
	38.1 To how many outsourcing providers have the CIGA been outsourced:		
	38.2 Provide the following information in respect of each outsourcing provider:		
	Name: Address:		
	Addiess.		
	38.3 Expenditure on the outsourcing provider:		
	38.4 Have the outsourcing provider's employees been included within the FTE for the activity: Yes		
	No		
	38.5 Have the outsourcing provider's premises been included in row 36:		
	Yes		
	No L		
	Provide the information specified in 38.1 to 38.5 with respect to each additional outsourcing provider on a separate sheet		
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55		

Rows	s 39 to 43: Insurance Business	
39.	CIGA The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable): (i) Predicting and calculating risk	
	(ii) Insuring or re-insuring against risk (iii) Providing insurance business services to clients	
40.	Employees Physically Present in Saint Vincent and the Grenadines	
	40.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the insurance business of the entity:	
	40.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:	
	40.3 Details of experience of FTE stated above:	
41.	Premises Address of each premises in Saint Vincent and the Grenadines used in the insurance business:	
	If more than one premises, specify details on a separate sheet	
42.	Operating Expenditure Total gross expenditure incurred in Saint Vincent and the Grenadines on the insurance business:	
43.	Outsourcing Have any of the CIGA been outsourced: Yes No Provide the additional information below	
	43.1 To how many outsourcing providers have the CIGA been outsourced:	
	43.2 Provide the following information in respect of each outsourcing provider:	
	Name: Address:	
	43.3 Expenditure on the outsourcing provider:	
	43.4 Have the outsourcing provider's employees been included within the FTE for the activity:	
	Yes No	
	43.5 Have the outsourcing provider's premises been included in row 31:	
	Yes No	
	Provide the information specified in 43.1 to 43.5 with respect to each additional outsourcing provider on a separate sheet	
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55	

Rows 44 to 49: Intellectual Property Holding Business						
44.	Is the relevant entity a high-risk IP entity, as defined in section 4 of the Act:					
	Yes Provide the information below					
	No Go to row 45					
	In the case of a high-risk IP entity, does the relevant entity intend to provide evidence to rebut the presumption (in section 9(6) of the Act) that the entity does not conduct CIGA in Saint Vincent and the Grenadines:					
	Yes Attach all relevant evidence in support					
	No					
45.	CIGA					
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):					
	A. CIGA where the entity holds, exploits or receives income from one or more patents, research and development relating to the patent:					
	(i) Advancing the understanding of scientific relations or technologies					
	(ii) Addressing scientific or technological obstacles					
	(iii) Increasing scientific or technical knowledge or developing new applications					
	B. CIGA where the entity holds, exploits or receives income from any intellectual property assets or assets, other than patents :					
	(i) Marketing, branding and distribution activities relating to the asset or assets					
	(ii) Taking strategic decisions and managing, as well as bearing, the principal risks related to development and subsequent exploitation of the asset or assets that generate the income					
	(iii) Taking the strategic decisions and managing, as well as bearing, the principal risks relating to acquisition by third parties and subsequent exploitation and protection of the asset or assets					
	(iv) Carrying on the underlying trading activities through which the asset or assets are exploited leading to the generation of income from third parties					
	Note: In the case of B(ii), (iii) and (iv), the specified CIGA is only available in exceptional circumstances and is not available to a high-risk IP entity					
	If B(ii), (iii) and/or (iv) selected, specify the exceptional circumstances relied upon and attach supporting evidence:					
46.	Employees Physically Present in Saint Vincent and the Grenadines					
	46.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the intellectual property holding business of the entity:					
	46.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:					
	46.3 Details of experience of FTE stated above:					

47.	Premises				
	Address of each premises in Saint Vincent and the Grenadines used in the intellectual property holding business:				
	If more than one premises, specify details on a separate sheet				
48.	Operating Expenditure				
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the intellectual property holding business:				
49.	Outsourcing				
	Have any of the CIGA been outsourced: Yes No Provide the additional information below				
	NO				
	49.1 To how many outsourcing providers have the CIGA been outsourced:				
	49.2 Provide the following information in respect of each outsourcing provider:				
	Name:				
	Address:				
	49.3 Expenditure on the outsourcing provider:				
	49.4 Have the outsourcing provider's employees been included within the FTE for the activity:				
	Yes				
	No L				
	49.5 Have the outsourcing provider's premises been included in row 47:				
	Yes				
	No L				
	Provide the information specified in 49.1 to 49.5 with respect to each additional outsourcing provider on a separate sheet				
	Continue to next applicable relevant activity or if no other relevant activities undertaken, go to row 55				

Rows	Rows 50 to 54: Shipping Business					
50	CIGA					
	The CIGA conducted in Saint Vincent and the Grenadines during assessment period (tick all applicable):					
	(i) Managing crew, including hiring, paying and overseeing crew members					
	(ii) Hauling and maintaining ships					
	(iii) Overseeing and tracking deliveries					
	(iv) Determining what goods to order and when to deliver them					
	(v) Organising and overseeing voyages					
51.	Employees Physically Present in Saint Vincent and the Grenadines					
	51.1 Number of experienced full time employees or other equivalent personnel (FTE) responsible for carrying on the shipping business of the entity:					
	51.2 Number of FTE stated above who hold relevant qualifications, with details of qualifications:					
	51.3 Details of experience of FTE stated above:					
52.	Premises Address of each premises in Saint Vincent and the Grenadines used in the shipping business:					
	If more than one premises, specify details on a separate sheet					
53.	Operating Expenditure					
	Total gross expenditure incurred in Saint Vincent and the Grenadines on the shipping business:					
54.	Outsourcing					
	Have any of the CIGA been outsourced: Yes No Provide the additional information below					
	54.1 To how many outsourcing providers have the CIGA been outsourced:					
	54.2 Provide the following information in respect of each outsourcing provider:					
	Name:					
	Address:					
	54.3 Expenditure on the outsourcing provider:					
	54.4 Have the outsourcing provider's employees been included within the FTE for the activity:					
	Yes					
	No L					
	54.5 Have the outsourcing provider's premises been included in row 52:					
	Yes L					
	No L					
	Provide the information specified in 54.1 to 54.5 with respect to each additional outsourcing provider on a separate sheet					
	Go to row 55					

Rows 55 to 58: Direction and Management in Saint Vincent and the Grenadines					
To be	completed by all relevant entities				
55.	Number of Board Meetings				
	55.1 State the number of Board Meetings held in Saint Vincent and the Grenadines where a quorum of directors was physically present in Saint Vincent and the Grenadines:				
	an estars was projected in same vincent and the Grendanies.				
	55.2 State the number of Board Meetings held outside Saint Vincent and the Grenadines or in Saint Vincent and the Grenadines, where a quorum of directors was not physically present in Saint Vincent and the Grenadines:				
	55.3 Does the relevant entity consider, on its assessment, that board meetings in Saint Vincent and the Grenadines were held with adequate frequency:				
	Yes				
	No				
	Go to row 56				
56.	Strategic Decisions				
	Have strategic decisions been made at the board meetings referred to in question 85.1:				
	Yes				
	No				
	Go to row 57				
57.	Knowledge, Experience and Expertise of Directors				
	Does the relevant entity consider, on its assessment, that the directors, collectively as a board, have a sufficient spread of knowledge, experience and expertise to discharge the duties of the board:				
	Yes				
	No				
	Go to row 58				
58.	Board Minutes and Company Records				
	Are the board minutes and all statutorily required records kept in Saint Vincent and the Grenadines:				
	Yes				
	No				
	Go to row 59				
Row !	59: Assessment of Relevant Entity				
To be	completed by all relevant entities				
59.	On the basis of the relevant entity's own analysis, does the company meet the economic substance requirements set out in section 5 of the Act for the assessment period:				
	Yes				
	No				
	Go to Declaration				
Declaration:					
I declare that all information in this Return is					
accurate and I understand that under section 27 of the International Tax Co-operation (Economic Substance) Act 2020, it					

is an offence to knowingly or willfully provide false or misleading information to the Controller, including by the omission

of material information. I further declare that I am authorised to sign this Return.

Signed under my hand this	day of	20
,	,	
Signature	Director or other Officer	